

February 6, 2006

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, NW
Washington, DC 20554

**Re: EB-06-TC-060, EB Docket No. 06-36
Certification of CPNI Filing, February 6, 2006,
Rock Hill Telephone Company (d/b/a Comporium) and
its affiliated companies**

Dear Ms. Dortch:

Pursuant to the Commission's Public Notice, DA 06-223 (Jan. 30, 2006), attached please find Rock Hill Telephone Company, (d/b/a "Comporium") and its affiliated companies' Certification of CPNI Filing and the accompanying descriptive statement as required by Section 64.2009 of the Commission's Rules.

The undersigned can be contacted should you have any questions or require additional information.

Sincerely,



Greg Lunsford
Manager — Regulatory Affairs
Comporium
P.O. Box 470
Rock Hill, SC 29731

Rock Hill Telephone Company - FCC 499 Filer ID: 803649
Fort Mill Telephone Company – FCC 499 Filer ID: 803655
Lancaster Telephone Company – FCC 499 Filer ID: 803652
Community Long Distance, Inc. – FCC 499 Filer ID: 804993
Springboard Telecom, LLC– FCC 499 Filer ID: 819828
Comporium Wireless, LLC– FRN: 0005464284

P. O. Box 470, Rock Hill, South Carolina 29731

CERTIFICATION

I am an officer of Rock Hill Telephone Company (d/b/a “Comporium”) and its affiliated companies, Fort Mill Telephone Company (d/b/a “Comporium”), Lancaster Telephone Company (d/b/a “Comporium”), Community Long Distance, Inc. (d/b/a “Comporium”), Springboard Telecom, LLC and Comporium Wireless, LLC (collectively the “Company”). On behalf of the Company, I hereby certify that I have personal knowledge that the Company is in compliance with the Federal Communications Commission (“FCC”) rules respecting customer proprietary network information (“CPNI”) contained in Part 64, Subpart U of the FCC’s rules.¹ Accompanying this certificate is a statement explaining how the Company is in compliance with the FCC’s CPNI rules. I hereby certify that the statements contained within this certification and the accompanying statement are accurate, complete and in accordance with FCC rules.



Matthew L. Dosch
Vice President — External Affairs
Rock Hill Telephone Company
Fort Mill Telephone Company
Lancaster Telephone Company
Community Long Distance Company
Springboard Telecom, LLC
Comporium Wireless, LLC

February 3, 2006

Attachment

¹ 47 C.F.R. §§ 64.2001-2009.

Rock Hill Telephone Company - FCC 499 Filer ID: 803649
Fort Mill Telephone Company – FCC 499 Filer ID: 803655
Lancaster Telephone Company – FCC 499 Filer ID: 803652
Community Long Distance Company – FCC 499 Filer ID: 804993
Springboard Telecom, LLC– FCC 499 Filer ID: 819828
Comporium Wireless, LLC– FRN: 0005464284

P O. Box 470, Rock Hill, South Carolina 29731

STATEMENT OF FCC CPNI RULE COMPLIANCE

This statement serves to explain how Rock Hill Telephone Company (d/b/a “Comporium”) and its affiliated companies, Fort Mill Telephone Company (d/b/a “Comporium”), Lancaster Telephone Company (d/b/a “Comporium”), Community Long Distance, Inc. (d/b/a “Comporium”), Springboard Telecom, LLC and Comporium Wireless, LLC (collectively the “Company”) is complying with Federal Communications Commission (“FCC”) rules related to the privacy of customer information. The type of information for which customer privacy is protected by the FCC’s rules is called “customer proprietary network information” (“CPNI”). The FCC’s rules restricting telecommunication company use of CPNI are contained at Part 64, Subpart U of the FCC’s rules (47 C.F.R. §§ 64.2000-2009).

1. Identification of CPNI

The Company has established procedures and trained employees having access to, or occasion to use customer data, to identify what customer information is CPNI consistent with the definition of CPNI under the FCC’s rules at Part 64, Subpart U, Section 64.2003(d) and Section 222(f)(1) of the Communications Act of 1934 as amended (47 U.S.C. § 222(f)(1)).

2. Identification of Services Affected by CPNI Rules

The Company has established procedures and trained employees to recognize the different types of telecommunications and non-telecommunications services that affect how the Company uses CPNI.

3. Identification of Permissible Uses of CPNI without Customer Authorization

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI **not** requiring customer authorization under the FCC’s Part 64, Subpart U, Section 64.2005.

4. Identification of Uses of CPNI Requiring Customer Authorization

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI requiring customer authorization under the FCC’s rules at Part 64, Subpart U, Section 64.2007.

5. Customer Notification and Authorization Process

The Company has established procedures, and trained employees responsible for obtaining customer authorization to use CPNI for marketing purposes, regarding the notice and approval requirements under the FCC's Part 64, Subpart U CPNI rules. FCC's CPNI rules at Part 64, Subpart U, Section 64.2008. The Company has complied with the notice requirements for Opt-Out approval. The Company does not provide CPNI to other parties and thus has not used the opt-in approval process.

6. Record of Customer CPNI Approval/Non-Approval

The Company has developed and utilizes a system for maintaining readily accessible record of whether and how a customer has responded to Opt-Out approval as required by Section 64.2009(a) of the FCC's Part 64, Subpart U CPNI rules.

7. Disciplinary Process

The Company has in place an express disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under the FCC's Part 64, Subpart U CPNI rules.

8. Supervisory Review Process for Outbound Marketing

The Company has established a supervisory review process regarding its compliance with the rules in Part 64, Subpart U, for outbound marketing situations. Prior to any outbound marketing effort, sales personnel must obtain supervisory approval of the proposed outbound marketing use. Any approval of CPNI use for outbound marketing efforts is limited to CPNI not requiring prior customer authorization or, where prior customer authorization is required, CPNI of customers having given the Company prior approval. The Company maintains records of its compliance for a minimum of one year.